

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
BOSTON DISTRICT**

JOYCE ROWLEY,
PLAINTIFF, PRO SE

CASE NO. 21-cv-11649-FDS

V.

CITY OF NEW BEDFORD, MASSACHUSETTS
DEFENDANT

PLAINTIFF'S MOTION TO COMPEL

In this Endangered Species Act citizen's suit, Plaintiff Joyce Rowley moves to compel Defendant City of New Bedford to provide access to Asian elephant Ruth in the elephant barn in order to conduct a videorecorded assessment.

Ruth's health is in question, and time is of the essence. But despite Rowley's best efforts to get cooperation, the City refused access four times and refused to cooperate with Rowley.

Rowley seeks a Court Order for immediate unfettered access to videorecord Asian elephant Ruth in her barn.

Respectfully submitted,
/s/Joyce Rowley
Plaintiff pro se
PO Box 50251
New Bedford, MA 02745

CERTIFICATE OF SERVICE

This is to certify that Plaintiff Joyce Rowley has served a copy of this document on this date by ECF to Defendant's attorney of record John Markey, Markey & Walsh, LLC, at jmarkey@msmw-law.com and Kreg Espinola, New Bedford Assistant City Solicitor, via email at kespinola@bevlegal.com.

Respectfully submitted,
/S/Joyce Rowley
Plaintiff pro se
PO Box 50251
New Bedford, MA 02745